

1 STEVEN KALAR
2 Federal Public Defender
2 JOYCE LEAVITT
3 Assistant Federal Public Defender
3 555 12th Street, Suite 650
4 Oakland, CA 94607-3627
4 (510) 637-3500

5 Counsel for Defendant JOSE VLADAMIR ORTIZ

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7 IN THE UNITED STATES DISTRICT COURT

8

FOR THE NORTHERN DISTRICT OF CALIFORNIA

9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) No. CR 15-00212 JST
12 v.) STIPULATION AND [PROPOSED]
13) ORDER CONTINUING DATE FOR
14 JOSE VLADAMIR ORTIZ,) CHANGE OF PLEA; EXCLUSION OF
15 Defendant.) TIME

16

STIPULATION

17

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of
plea date for Jose Vladamir Ortiz, currently scheduled for June 5, 2015, at 9:30 a.m., may be
continued one week to June 12, 2015, at 9:30 a.m. for change of plea. The reason for the request is
that defense counsel is unavailable after 10:30 a.m. Continuing the matter for one week will ensure
that counsel can be present with Mr. Ortiz during the change of plea.

23

IT IS FURTHER STIPULATED THAT the time from June 5, 2015, to June 12, 2015, should
be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A)
and (h)(7)(B)(iv) for continuity of counsel and effective preparation so that defense counsel can be

1 present during the change of plea and answer his questions during the proceedings.

2 DATED: 5/28/15

3 /s/
JOYCE LEAVITT
Assistant Federal Public Defender

4 DATED: 5/28/15

5 /s/
KATIE BURROUGHS MEDEARIS
6 Assistant United States Attorney

7 I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all
8 signatures within this e-filed document.

9 **ORDER**

10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the court date for Jose Ortiz,
11 currently scheduled for June 5, 2015, is continued to June 12, 2015, at 9:30 a.m. for change of plea.

12 IT IS FURTHER ORDERED THAT the time from June 5, 2015, to June 12, 2015, be excluded
13 in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and
14 (h)(7)(B)(iv) for continuity of counsel and effective preparation of counsel taking into consideration
15 due diligence so that defense counsel can be present during the change of plea and answer questions,
16 as well as advise Mr. Ortiz during the proceedings. The Court finds there is good cause and the ends
17 of justice served by the granting of the continuance outweigh the interests of the public and
18 defendant. Failure to grant the requested continuance would unreasonably deny counsel reasonable
19 time necessary for effective preparation, taking into account due diligence.

20 SO ORDERED.
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22 DATED: May 28, 2015
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